

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Alco NVC, Inc.
580 Old St Jean Street
Detroit, Michigan 48214

ATTENTION:

Weimar King
Development Chemist
wking@alco-products.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Alco NVC Inc. (Alco or you) to submit certain information about the facility at 580 Old St Jean Street, Detroit, Michigan (Facility). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Alco owns and operates an asphalt roofing manufacturing facility. We are requesting this information to determine whether you are complying with 40 C.F.R. Part 60 Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture (NSPS UU) and 40 C.F.R. Part 63 Subpart AAAAAAA National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing (NESHAP 7A).

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Alco to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Brittany Cobb at cobb.brittany@epa.gov or 312-353-1248, or Natalia Vazquez at vazquez.natalia@epa.gov or 312-353-8314 to make arrangements to submit your response.

Alco must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Alco to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Brittany Cobb at 312-353-1248 or Natalia Vazquez at 312-353-8314.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or 40 C.F.R. Part 60 Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture (NSPS UU) and 40 C.F.R. Part 63 Subpart AAAAAAA National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing (NESHAP 7A).

1. *Asphalt roofing plant* means a plant which produces asphalt roofing products (shingles, roll roofing, siding, or saturated felt) 40 C.F.R. § 60.471.
2. *Asphalt roofing manufacturing operation* means the collection of equipment used to manufacture asphalt roofing products through a series of sequential process steps. The equipment configuration of an asphalt roofing manufacturing process varies depending upon the type of substrate used (*i.e.*, organic or inorganic). For example, an asphalt roofing manufacturing line that uses organic substrate (*e.g.*, felt) typically would consist of a saturator (and wet looper), coating mixer, and coater (although the saturator could be bypassed if the line manufacturers multiple types of products). An asphalt roofing manufacturing line that uses inorganic (fiberglass mat) substrate typically would consist of a coating mixer and coater. 40 C.F.R. § 63.11566.
3. *Asphalt storage tank* means any tank used to store asphalt at asphalt roofing plants, petroleum refineries, and asphalt processing plants. Storage tanks containing cutback asphalts (asphalts diluted with solvents to reduce viscosity for low temperature applications) and emulsified asphalts (asphalts dispersed in water with an emulsifying agent) are not subject to this regulation. 40 C.F.R. § 60.471.
4. *Coater* means the equipment used to apply amended (filled or modified) asphalt to the top and bottom of the substrate (typically fiberglass mat) used to manufacture shingles and rolled roofing products. 40 C.F.R. § 63.11566.

5. *Mineral handling and storage facility* means the areas in asphalt roofing plants in which minerals are unloaded from a carrier, the conveyor transfer points between the carrier and the storage silos, and the storage silos. 40 C.F.R. § 60.471.
6. *Saturator* means the equipment in which asphalt is applied to felt to make asphalt roofing products. The term saturator includes the saturator, wet looper, and coater. 40 C.F.R. § 60.471.

Appendix B

Information You Are Required to Submit to EPA

Alco NVC Inc. (Alco or you) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) in accordance with the schedule specified in Table 1, below:

Table 1: Submission Date

Requested Item	Due Date
Requested Information – paragraphs 1-5	Within 30 days of receipt of this request
Emission Test Protocol – paragraph 10	Within 30 days of receipt of this request
Emission Test Notification – paragraph 11	Within 45 days of this request
Emission Test – paragraph 6	Within 60 days of receipt of this request
Emission Test Report – paragraph 12	Within 90 days of receipt of this request

Requested Information

1. Provide a copy of the 40 C.F.R Part 63, Subpart AAAAAAA Initial Notification and Notification of Compliance Status, including the compliance test results, in accordance with 40 C.F.R. § 63.11564. If the Facility has not submitted an Initial Notification and Notification of Compliance Status prior to this information request, indicate that in your response.
2. In the October 1, 2009 Compliance Air Emission Test Report that Alco provided to the Michigan Department of Environment, Great Lakes, and Energy, there was a reference to “SCF8-2 Baghouse” as the control device for the asphalt roofing manufacturing process. This control device was not present during EPA’s August 16, 2022 inspection.
 - a. When did the Facility remove this baghouse?
 - b. If the baghouse was not present at the time the Facility changed ownership, then indicate that in your response and provide the date of ownership change.
 - c. Provide any supporting documentation and/or narrative description as to why this control device was removed.
3. Has Alco performed any emission test(s) since September 3, 2009? If the Facility has completed any emission test(s), provide a copy of the report(s).
4. If Alco still operates SCF8-2 baghouse, then provide the following information:
 - a. Manufacturer’s design specifications and capacity;
 - b. Manufacturer’s operation and maintenance-related recommendations;
 - c. Is SCF8-2 baghouse capable of removing sticky, oily, or liquid aerosol particulate matter from exhaust gas streams?
 - d. Narrative description of the parameters the Facility monitors to ensure SCF8-2 baghouse is operating properly and controlling emissions;

- e. If Alco maintains records of SCF8-2 baghouse monitored parameters, then provide 2020, 2021 and 2022 monitoring records, preferably in excel format.
5. If Alco operates any control device(s) that controls emissions of each coater, provide the following information:
- a. Date that the control device(s) was installed;
 - b. Manufacturer's design specifications and capacity;
 - c. Manufacturer's operation and maintenance-related recommendations;
 - d. Description of the parameters the Facility monitors to ensure the control device(s) is operating properly and controlling emissions;
 - e. If Alco maintains records of control device monitored parameters, then provide 2020, 2021 and 2022 monitoring records, preferably in excel format.

Emission Test

6. Within 60 days of receiving this request, Alco must perform an emission test to measure particulate matter (PM) and polycyclic aromatic hydrocarbon (PAH) emissions (lbs/hr) from each coater, determine opacity from the mineral handling and storage, and build a temporary total enclosure (TTE) to properly capture and measure PM and PAH emissions. Alco shall conduct the emission test in accordance with the test protocol approved in advance by EPA.
- a. Alco must perform the emission test on each coater by using a combination of the following EPA Reference Methods, as found in Appendix A to 40 C.F.R. Part 60 (Test Methods):
 - i. EPA test method 1 or 1A, to select the sampling locations and number of traverse points;
 - ii. EPA test method 2, 2A, 2C, 2D, 2F, or 2G, as appropriate, to determine the velocity and volumetric flow rate;
 - iii. EPA test method 3, 3A or 3B, as appropriate, to determine gas molecular weight used for flow rate determination;
 - iv. EPA test method 4, to measure the moisture content of the stack gas;
 - v. EPA test method 5A, to measure PM emissions;
 - vi. EPA test method 9, to measure opacity;
 - vii. EPA test method 23 with analysis by SW-846 Method 8270D, to measure PAH emissions; and
 - viii. EPA test method 204 for the TTE.
 - b. Testing must be conducted at a production rate and operating conditions that are consistent with representative (normal) conditions as described in EPA Stack Testing Guidance¹.

¹ Tests should be performed under conditions that represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and that are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable

- i. Identify the maximum capacity of each emission unit and the production rate you plan to achieve during the test. Provide a narrative description of how those conditions are consistent with the Clean Air Act National Container Stack Testing Guidance. If you do not plan to operate at the maximum capacity, provide an explanation as to why the expected capacity meets the testing conditions described in EPA Stack Testing Guidance;
 - ii. Describe parametric operating ranges for the processes and how they will be operating during the test. Provide a description of how those conditions are consistent with the Clean Air Act National Container Stack Testing Guidance;
 - iii. Provide information on the expected temperature the Facility will coat the fiberglass and polyester films.
- c. The emission testing of the coaters must comply with the following requirements:
 - i. Each test shall consist of three separate runs, each lasting a minimum of 120 minutes and 3.00 dscm (106 dscf).
 - ii. If the coater is not controlled by a control device, measurements will be at the outlet of the coater.
 - iii. If the coater is controlled by a control device, measurements will be simultaneous taken at the outlet of the coater and at the outlet of the control device.
 - iv. The following parameters, at a minimum, must be measured and recorded during each emission test run (where applicable):
 - 1. Outlet gas temperature;
 - 2. Outlet flow rate; and
 - 3. Total amount (tons) of asphalt roofing product manufactured (i.e., asphalt shingle or roofing roll) per run.
- 7. Within 30 days after receipt of this request, Alco shall submit to EPA the proposed emission test protocol(s) that describes the methods and procedures for testing each emission source, including all relevant operating parameters. The protocol shall address the requirements of paragraph 6a - 6d of this information request. In relation to paragraph 6c, include a description of how the Facility will operate each coater during the emission test to ensure its being operated at maximum operating capacity and at worst-case scenario. In advance of the tests, Alco must obtain written approval from EPA on the testing and make any adjustments to the protocols required by EPA.
- 8. Within 45 days of receipt of this request and at least 15 days prior to the planned test date(s), Alco shall submit notification to EPA of its intent to perform emission testing. You must submit this notice by e-mail to Brittany Cobb at cobb.brittany@epa.gov and Natalia Vazquez at vazquez.natalia@epa.gov.

emission standards, but without creating an unsafe condition. Clean Air Act National Container Stack Testing Guidance, § VII.5 (April 27, 2009), available at https://www.epa.gov/sites/default/files/2013-09/documents/stacktesting_1.pdf

9. Within 90 days after receipt of this request required by this information request, Alco shall submit a complete report of the emissions test on its coaters and mineral handling and storage facility, including, at a minimum, the following:
- a. Summary of Results
 - i. Results of the above specified emission tests:
 - 1. PM emission results in pounds of PM per ton of asphalt roofing product manufactured;
 - 2. PM emission results in pounds of PM per hour;
 - 3. PAH emission results in pounds of PAH per ton of asphalt roofing product manufactured;
 - 4. PAH emission results in pounds of PAH per hour;
 - 5. EPA test Method 9 - Determination of Opacity; and
 - 6. Results of the TTE evaluation.
 - ii. Discussion of response factors, molecular weight corrections; or any other factors used to convert raw data into the reported results;
 - iii. Discussion of test errors; and
 - iv. Discussion of any deviations from the reference test methods.
 - b. Facility Operations
 - i. Description of the process and control equipment (if applicable) in operation during the emissions test;
 - ii. Operating parameters of the coaters and related equipment at the time of the test, including but not limited to the temperature the Facility coated the fiberglass and polyester films, the outlet gas temperature and outlet flow rate; and
 - iii. Facility operating parameters that demonstrate that the coaters were operated at maximum production rates and at worst-case operating parameters at the time of the test.
 - c. Production data
 - i. Asphalt roofing product manufactured during each test run (tons);
 - ii. Amount of each raw material feed into the process; and
 - iii. Processing time.
 - d. Sampling and Analytical Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Cyclonic flow results;
 - iii. Sampling point description, including labeling system;
 - iv. Brief description of sampling procedures, including equipment and diagram;
 - v. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - vi. Brief description of analytical procedures, including calibration;

- vii. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
- viii. Quality control and quality assurance procedures, tests, and results.

e. Appendix

- i. Complete results with example calculations;
- ii. Calculations for converting raw data into the reported results;
- iii. Copies of notes or forms documenting raw field data (if collected in non-digital format);
- iv. Laboratory report, with signed chain-of-custody forms;
- v. Calibration procedures and results;
- vi. Raw process and control equipment data, signed by plant representative;
- vii. Test log;
- viii. Project participants and titles; and
- ix. Related correspondence.